



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

Muriel Goode-Trufant
Corporation Counsel

Ruth F. Jeannite
Assistant Corporation Counsel
Phone: (212) 356-2695
Email: rjeannit@law.nyc.gov

February 12, 2025

BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza
East Brooklyn, NY 11201

Re: Pastrana v. New York City Fire Department, et al.
No.: 1:24-cv-07348 (BMC)

Dear Judge Cogan:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for defendants New York City Fire Department, New York City Department of Health and Mental Hygiene, and the City of New York (collectively, "Defendants"), in the above-referenced proceeding. Defendants respectfully request a brief extension of time, from February 14, 2025 to February 28, 2025, to file their motion to dismiss the Amended Complaint. Because the requested extension would impact the deadline currently set for the parties to serve written discovery requests, Defendants also request that the date by which the parties are to serve written discovery requests be extended from February 21, 2025 to February 28, 2025. Plaintiff's counsel has consented to this request.

The requested extension is necessary so that Defendants may sufficiently investigate the various allegations in Plaintiff's 300-paragraph Amended Complaint, consult with relevant agency personnel, and formulate an appropriate response. Granting this request will ensure that Defendants can adequately address the claims raised by Plaintiff.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Ruth Jeannite

Ruth Jeannite
Assistant Corporation Counsel

cc: All Counsel of Record (by ECF)